

November 13, 2007

Burnet R. Maybank, III
Member
Admitted in SC

**VIA ELECTRONIC FILING, HAND-
DELIVERY AND REGULAR MAIL**

Public Service Commission
Docketing Department
P.O. Drawer 11649
101 Executive Center Drive
Columbia, South Carolina 29211

**Re: Application of Alltel Communications, Inc for Designation as an Eligible
Telecommunications Carrier Pursuant to Section 214(e)(2) of the
Communications Act of 1934
Alltel Brief - Docket Number 2007-151-C**

Dear Ladies and Gentlemen:

Charleston

Charlotte

Columbia

Greensboro

Greenville

Hilton Head

Myrtle Beach

Enclosed for filing please find an original and one (1) copy of Alltel Brief in the above-referenced matter, together with a docket cover sheet.

By copy of this letter, I am serving all parties of record with a copy of this Alltel Brief as indicated on the attached Certificate of Service.

The enclosed document is an exact duplicate of the e-filed copy submitted to the Commission in accordance with its electronic filing instructions.

Very truly yours,



Burnet R. Maybank, III
Enclosures
BRM/sjn

cc: Nanette S. Edwards, Esq.
All Parties of Record

Docket Number 2007-151-C

**Application of Alltel Communications, Inc. for Designation as an Eligible
Telecommunications Carrier (ETC) in the State of South Carolina**

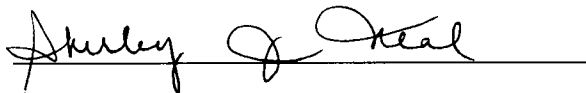
CERTIFICATE OF SERVICE

I, Shirley J. Neal, hereby certify that on this 13th day of November, 2007, a copy of **Alltel Brief** was placed in the United States mail, via first class, postage prepaid to:

C. Leslie Hammonds
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Post Office Box 11263
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721 Olive Street
Columbia, SC 29205

A handwritten signature in cursive script, reading "Shirley J. Neal", is written over a horizontal line.

STATE OF SOUTH CAROLINA

(Caption of Case)

Application of Alltel Communications, Inc. for
Designation As An Eligible Telecommunications
Carrier Pursuant to Section 214(d)(2) of the
Communications Act of 1934

BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

COVER SHEET

DOCKET
NUMBER: 2005 - 151 - C

(Please type or print)

Submitted by: Burnet R. Maybank IIIAddress: Nexsen Pruet, LLC1441 Main Street, Suite 1500Columbia, SC 29201SC Bar Number: 3699Telephone: 803-771-8900Fax: 803-253-8277

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NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

DOCKETING INFORMATION (Check all that apply)

☐ Emergency Relief demanded in petition☒ Request for item to be placed on Commission's Agenda expeditiously☐ Other: _____

INDUSTRY (Check one)	NATURE OF ACTION (Check all that apply)			
<input type="checkbox"/> Electric	<input type="checkbox"/> Affidavit	<input checked="" type="checkbox"/> Letter	<input type="checkbox"/> Request	
<input type="checkbox"/> Electric/Gas	<input type="checkbox"/> Agreement	<input type="checkbox"/> Memorandum	<input type="checkbox"/> Request for Certification	
<input type="checkbox"/> Electric/Telecommunications	<input type="checkbox"/> Answer	<input type="checkbox"/> Motion	<input type="checkbox"/> Request for Investigation	
<input type="checkbox"/> Electric/Water	<input type="checkbox"/> Appellate Review	<input type="checkbox"/> Objection	<input type="checkbox"/> Resale Agreement	
<input type="checkbox"/> Electric/Water/Telecom.	<input type="checkbox"/> Application	<input type="checkbox"/> Petition	<input type="checkbox"/> Resale Amendment	
<input type="checkbox"/> Electric/Water/Sewer	<input checked="" type="checkbox"/> Brief	<input type="checkbox"/> Petition for Reconsideration	<input type="checkbox"/> Reservation Letter	
<input type="checkbox"/> Gas	<input type="checkbox"/> Certificate	<input type="checkbox"/> Petition for Rulemaking	<input type="checkbox"/> Response	
<input type="checkbox"/> Railroad	<input type="checkbox"/> Comments	<input type="checkbox"/> Petition for Rule to Show Cause	<input type="checkbox"/> Response to Discovery	
<input type="checkbox"/> Sewer	<input type="checkbox"/> Complaint	<input type="checkbox"/> Petition to Intervene	<input type="checkbox"/> Return to Petition	
<input checked="" type="checkbox"/> Telecommunications	<input type="checkbox"/> Consent Order	<input type="checkbox"/> Petition to Intervene Out of Time	<input type="checkbox"/> Stipulation	
<input type="checkbox"/> Transportation	<input type="checkbox"/> Discovery	<input type="checkbox"/> Prefiled Testimony	<input type="checkbox"/> Subpoena	
<input type="checkbox"/> Water	<input type="checkbox"/> Exhibit	<input type="checkbox"/> Promotion	<input type="checkbox"/> Tariff	
<input type="checkbox"/> Water/Sewer	<input type="checkbox"/> Expedited Consideration	<input type="checkbox"/> Proposed Order	<input type="checkbox"/> Other: _____	
<input type="checkbox"/> Administrative Matter	<input type="checkbox"/> Interconnection Agreement	<input type="checkbox"/> Protest		
<input type="checkbox"/> Other: _____	<input type="checkbox"/> Interconnection Amendment	<input type="checkbox"/> Publisher's Affidavit		
	<input type="checkbox"/> Late-Filed Exhibit	<input type="checkbox"/> Report		

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BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

IN THE MATTER OF

**APPLICATION OF ALLTEL
COMMUNICATIONS, INC. FOR
DESIGNATION AS AN ELIGIBLE
TELECOMMUNICATIONS CARRIER
PURSUANT TO SECTION 214(e)(2) OF THE
COMMUNICATIONS ACT OF 1934**

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Docket No. 2007-151-C

ALLTEL BRIEF

COMES NOW, Alltel Communications, Inc. (“Alltel”) in response to the Commission’s Order Requesting Briefs dated November 2, 2007. Alltel responds as follows;

On October 26, 2007, the FCC issued a Memorandum Opinion and Order approving transfer of control of wireless licenses, leases and certain authorizations held by Alltel Corporation to Atlantis Holdings LLC. *Memorandum Opinion and Order*, FCC 07-185, WT Docket No. 07-128 (Oct. 26, 2007). As a condition of the approved transfers, the FCC imposed an interim cap on the federal support received by Alltel on an annual basis. As a result of the condition, Alltel’s receipt of federal support will be capped and measured as of the end of June 2007 on an annualized basis.

The Commission, in its October 26, 2007, Order Requesting Briefs, sought comment from the parties on the impact of the above-identified FCC ruling on Alltel’s Application for Designation as an ETC in South Carolina. First, the cap does not alter the fact that Alltel will continue to provide service under the Alltel name and is committed, and legally obligated, to meet its universal service obligations where designated an ETC to the extent it receives universal service support – including South Carolina once

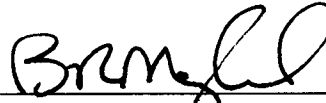
designated. Alltel will continue to utilize all federal support received for the purposes for which such support is intended – thereby benefiting the unserved and underserved areas.

As explained in its Application and resulting testimony in this proceeding, Alltel relies on federal support to construct, operate and maintain facilities and services that would not otherwise be available or economically viable absent use/investment of federal support. The FCC's recent conditioned approval does not change or otherwise impact the need for such support to further advance the goals of universal service.

Although the interim support cap will limit the amount of federal support that Alltel receives on an annual basis, it does not impact Alltel's ultimate commitment and obligation as an ETC to invest each dollar of support received to advance the goals of universal service.

As a result of the newly imposed cap this Commission need not decide arguments regarding the impact on the size of the fund as a result of Alltel's ETC designation in South Carolina. In short, designating Alltel as an ETC in South Carolina will not increase the size of the federal universal service fund.

The most significant "impact" for the Commission's consideration is the negative impact on South Carolina consumers if Alltel's designation is denied. Rejecting the Alltel designation will foreclose any investment of federal high-cost support in South Carolina by Alltel for the advancement of wireless service in underserved areas of South Carolina. On the other hand, designating Alltel as an ETC in South Carolina ensures that any federal support received by Alltel in South Carolina will be invested back in to South Carolina for the benefit of South Carolina consumers in order to advance the goals of universal service.



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November 13, 2007
Columbia, South Carolina